



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 29, 2024

By ECF

The Hon. Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States ex rel. Bassan et al. v. Omnicare, Inc. & CVS Health Corp.*,
15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

We write respectfully on behalf of the United States of America (the “Government”) to request the Court’s leave to file several exhibits to the Government’s letter filed today under a temporary 14-day seal, pursuant to Rule I.g of Your Honor’s Individual Practices and the Protective Order entered by the Court on November 29, 2021. *See* Dkt. No. 102 (the “Protective Order”).

In producing materials in discovery, Defendants designated certain documents as subject to the Protective Order. The Protective Order provides a process for the filing of such materials. Protective Order ¶ 19. Pursuant to that process, the Government respectfully requests that the Court grant leave to file Exhibits C through M to the Government’s letter and the portions of the letter discussing those exhibits under seal for a period of 14 days. *See id.* Per the Protective Order, Defendants, as the Producing Parties, may file a motion to seal the relevant information. *See id.*

We thank the Court for its consideration of this submission.

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: April 1, 2024

The request for leave to file exhibits under a temporary seal is granted. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 448 and to maintain ECF Nos. 449 and 449-1 through 449-13 under seal. After 14 days, the Court will advise the Clerk of Court to remove the viewing restrictions.

Respectfully submitted,

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